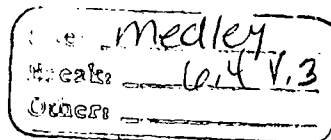


MEMORANDUM



TO: Richard Haynes, Engineer
Site Engineering Section
Division of Site Engineering and Screening
Bureau of Solid and Hazardous Waste Management

FROM: Billy Britton, Hydrologist *Billy Britton*
Superfund and Solid Waste Section
Division of Hydrogeology
Bureau of Solid and Hazardous Waste Management

DATE: July 17, 1992

RE: Revised Remedial Design Workplan, Field Sampling and
Analysis Plan, Quality Assurance Project Plan, and
Health and Safety Plan
Medley Farm NPL Site
SCD 980 558 142
Cherokee County

The referenced documents have been reviewed, as requested. With the exception of comment number one, all comments regarding the previous workplan documents made in a memorandum from the writer to Haynes dated April 3, 1992 appear to have been addressed.

Comment number one of the April 3, 1992 memorandum reiterated a previous comment made in a memorandum from Gorman to Haynes dated May 1, 1991 regarding the extent of groundwater contamination in the saprolite and bedrock northeast of well pair SW-108/BW-108 and in the bedrock below the southwest portion of the site. This comment should be addressed.

A few additional comments also appear necessary. They are as follows:

- 1) The Division of Hydrogeology (the Division) does not agree with the proposed method of disposal for drilling fluids and groundwater produced by well development and purging by allowing them to infiltrate into the subsurface from shallow excavations. The Division believes that it is inappropriate to allow all investigation derived waste to be treated as non-hazardous without proper documentation. Therefore, we request that all groundwater produced from well development and purging activities, drilling fluids, and cuttings collected from below the water-table be contained for proper disposal as described in the USEPA



Region IV Environmental Compliance Branch Standard
Operating Procedures and Quality Assurance Manual.

- 2) Page 5-17 of the Field Sampling and Analysis Plan states that the four proposed monitoring wells will be developed until discharge is sediment-free, or the change in specific conductance and temperature between two successive well volumes is less than ten percent. This statement should be modified to state that the wells will be developed until they produce sediment-free water and the change in specific conductance and temperature between two successive well volumes is less than ten percent.
- 3) In the third sentence of the fourth paragraph on page 2-8 in the Remedial Design Workplan "only two" should be replaced with "four".